

***NORTHROP GRUMMAN***

February 25, 2002

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Northrop Grumman Corporation  
Washington Office  
1000 Wilson Boulevard, Suite 2300  
Arlington, Virginia 22209-2278  
Telephone 703-875-8400

**Via Federal Express** (312-252-7647)

Ms. Carol Ropski  
U.S. Environmental Protection Agency  
Emergency Enforcement & Support Section, SE-5J  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

Re: Litton Systems, Inc., Liberty Copper and Wire Response to EPA  
Request for Information for the Downers Grove Groundwater Site

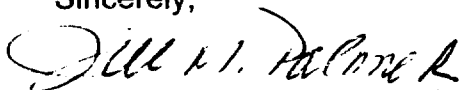
Dear Ms. Ropski:

Attached please find Litton Systems, Inc.'s response to EPA's request for information for the Downers Grove Groundwater Site in Downers Grove, DuPage County, Illinois.

Please be advised that Litton Systems, Inc. sold the Liberty Copper and Wire facility on July 1, 1984. All documents related to Litton's operation of the Liberty Copper and Wire facility were transferred with the sale of the facility. While every effort has been made to obtain information responsive to EPA's request, Litton's efforts has been significantly complicated by the fact that Litton has not operated the Liberty Copper and Wire facility for nearly 20 years and no longer has access to any records generated during its period of operation.

To assist us in our investigatory efforts, Litton would appreciate receiving any information that EPA may have in its files concerning the Liberty Copper and Wire facility and its alleged involvement with the Downers Grove Groundwater Site. Moreover, Litton reserves its right to supplement its response should additional information become available. If you have any questions on the attached response, please do not hesitate to call me at 703-875-8422.

Sincerely,



Jill M. Palmer  
Senior Counsel – Environmental Law



**Request for Information for the Downers Grove Groundwater Site  
in Downers Grove, DuPage County, Illinois  
Response of Litton Systems, Inc., Liberty Copper and Wire**

- 1. Identify all persons consulted in the preparation of the answers to these Information Requests.**

Dave Frederickson, Real Estate Department  
Ann Coons, Senior Counsel – Corporate Secretary's Office  
James Nelson, Corporate Secretary's Office

- 2. Identify all documents consulted, examined, or referred to in the preparation of the answers to these Requests, and provide copies of all such documents.**

Litton Systems, Inc. (Litton) sold Liberty Copper and Wire to MagneTek, Inc. (MagneTek) on July 1, 1984. All documents related to Litton's operation of Liberty Copper and Wire were transferred to MagneTek pursuant to the sale of the facility. For that reason, documents responsive to this Request are no longer in Litton's possession. Nor does Litton have access to any documents responsive to this Request.

- 3. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any Information Request, or who may be able to provide additional responsive documents, identify such persons.**

In light of the fact that the Liberty Copper and Wire facility was sold to MagneTek, MagneTek may be able to provide a more detailed or complete response or additional documents responsive to this Request. The last known address for MagneTek is as follows:

MagneTek, Inc.  
26 Century Boulevard  
P.O. Box 290159  
Nashville, TN 37229-0159

- 4. Identify all persons having knowledge or information about the generation, transportation, treatment, disposal or other handling of hazardous substances by you, your contractors, or by prior owners and/operators.**

Litton does not presently have information on persons with knowledge or information about the generation, transportation, treatment, disposal or other handling of hazardous substances by Liberty Copper and Wire or any other owner or operator at the Ellsworth Industrial Park Site.

- 5. Between 1950 and the present, did you ever use, purchase, store, treat, dispose, transport or otherwise handle any hazardous substances or material (including chlorinated solvents) at any location in the Ellsworth Industrial Park? If the answer to the preceding question is anything by an unqualified "no," identify:**
- a. The chemical composition, characteristic, physical state (e.g., solid, liquid)**

- or each hazardous substance;
- b. **Who supplied you with such hazardous substances;**
  - c. **How such hazardous substances were used, purchased, generated, stored, treated, transported, disposed, or otherwise handled by you;**
  - d. **When such hazardous substances were used, purchased, generated, stored, treated, transported, disposed, or otherwise handled by you;**
  - e. **Where such hazardous substances were used, purchased, generated, stored, treated, transported, disposed, or otherwise handled by you;**
  - f. **The quantity of such hazardous substances were used, purchased, generated, stored, treated, transported, disposed, or otherwise handled by you;**

Litton does not presently have information that Liberty Copper and Wire used, purchased, stored, treated, disposed, transported or otherwise handled hazardous substances or materials (including chlorinated solvents) at the Ellsworth Industrial Park Site.

6. **Describe the nature of your activities or business at the Site between 1950 and the present, with respect to purchasing, receiving, processing, storing, treating disposing, or otherwise handling hazardous substances or materials at the Site.**

Litton does not presently have information on the nature of Liberty Copper and Wire's activities or business between 1950 and the present with respect to purchasing, receiving, processing, storing, treating, disposing, or otherwise handling hazardous substances or materials at the Site.

7. **State the dates during which you owned, operated, or leased a portion of the Site, and provide copies of all documents evidencing or relating to such ownership, operation, or lease arrangement (e.g., deeds leases, etc.).**

Liberty Copper and Wire was acquired by Jefferson Electric Company on June 12, 1970 and merged into Litton Systems, Inc. on August 31, 1972. On July 1, 1984, Litton Systems, Inc. sold Liberty Copper and Wire to MagneTek. Litton does not presently have information relating to its ownership, operation or lease of the Liberty Copper and Wire facility. Further, since documents related to Litton's operation of Liberty Copper and Wire were transferred to MagneTek pursuant to the sale of the facility, Litton does not presently have any documents responsive to this Request.

8. **Provide information about any Facility you have ever owned or operated at the Site, including but not limited to the following:**

- a. **Property boundaries, including written legal description;**
- b. **Location of underground utilities (telephone, electrical, sewer, water main, etc.) and underground tanks;**
- c. **Surface structures (e.g., building, tanks etc.);**
- d. **Groundwater wells, including drilling logs;**
- e. **Storm water draining system, and sanitary sewer system, past and present, including septic tank(s) subsurface disposal field(s), and other underground structures; and where, when and how such systems are emptied;**

- f. Any and all addition, demolition, or changes of any kind on, under, or about the Site, to its physical structures, or to the property itself (e.g., excavation work); and any planned addition, demolition, or other changes to the Site; ad**
- g. All maps and drawings of the Site in your possession.**

Litton does not presently have the following information regarding the Liberty Copper and Wire facility: property boundaries; underground utilities; surface structures; groundwater wells; storm water drainage system; sanitary sewer system; and additions, demolitions or changes to the physical structure.

- 9. Identify all past and present solid waste units (e.g., waste piles and fills, surface impoundments, waste lagoons, waste ponds or pits, tanks, container storage areas, etc.) at any Facility you owned or operated at the Site. For each such solid waste unit identified, provide the following information:**
- a. A map showing the unit's boundaries and the location of all known solid waste units whether currently in operation or not. This map should be drawn to scale, if possible, and clearly indicate the location and size of all past and present units;**
  - b. The type of unit (e.g., storage area, landfill, waste pile, etc.), and the dimensions of the unit;**
  - c. The dates that the unit was in use;**
  - d. The purpose and past usage (e.g., storage, spill containment, etc.);**
  - e. The quantity and types of materials (hazardous substances an any other chemicals) located in each unit; and**
  - f. The construction (materials, composition), volume, size dates of cleaning, and condition of each unit.**
  - g. If unit is no longer in use, how was such unit closed and what actions were taken to prevent or address potential or actual releases of waste constituents from the unit.**

Litton does not presently have information on any past or present solid waste management units at the Liberty Copper and Wire facility.

- 10. Identify the prior owners of any property you owned or operated at the Site from 1950 through the present. From each prior owner, further identify:**
- a. The dates of ownership;**
  - b. All evidence showing that they controlled access to the Site; and**
  - c. All evidence that a hazardous substance, pollutant, or contaminant, was released or threatened to be released at the Site during the period that they owned the Site.**

Litton does not presently have information on the following: the dates prior property owners or operators occupied the Site; the access provided by such prior owners or operators; or any hazardous substances, pollutants or contaminants released or threatened to be released at the Site during the period that prior owners or operators occupied the Site.

- 11. Identify the prior operators, including lessors, of any property you owned or**

operated at the Site from 1950 through the present. For each such operator, further identify:

- a. The dates of operation;
- b. The nature of prior operations at the Site;
- c. All evidence that they controlled access to the Site; and
- d. All evidence that a hazardous substance, pollutant, or contaminant was released or threatened to be released at or from the Site and/or its solid waste units during the period that they were operating the Site.

Please refer to the response to Question #10, above. Litton does not presently have information on any prior operators, including lessors, of the property previously owned or operated by Liberty Copper and Wire.

12. **Provide copies of all local, state, and federal environmental permits ever granted for your Facility or Facilities in the Ellsworth Industrial Park or any part thereof (e.g., RCRA permits, NPDES permits, etc.).**

Since documents related to Litton's operation of Liberty Copper and Wire were transferred to MagneTek pursuant to the sale of the facility, Litton does not presently have copies of any local, state or federal environmental permits granted to the Liberty Copper and Wire facility.

13. **Did your Facility or Facilities in the Ellsworth Industrial Park ever have "interim status" under RCRA? If so, and the Facility does not currently have interim status, describe the circumstances under which the Facility lost interim status.**

Litton does not presently have information on whether the Liberty Copper and Wire facility had "interim status" under RCRA.

14. **Did your Facility or Facilities in the Ellsworth Industrial Park ever file a notification of hazardous waste activity under RCRA? If so, provide a copy of such notification.**

Litton does not presently have information on whether the Liberty Copper and Wire facility filed a notification of hazardous waste activity under RCRA.

15. **Provide all reports, information, or data related to soil, water (ground and surface) or air quality and geology/hydrogeology at and about the Site. Provide copies of all documents containing such data and information, including both past and current aerial photographs as well as documents containing analysis or interpretation of such data.**

Litton does not presently have information related to the soil, water (ground and surface), air quality or geology/hydrogeology at and about the Site.

16. **Identify all leaks, spills, or releases into the environment of any hazardous substances, pollutants, or contaminants (including chlorinated solvents) that have occurred at or from your Facility or Facilities at the Site. In addition, identify:**
- a. **When such releases occurred;**

- b. How the releases occurred;
- c. The amount of each hazardous substances, pollutants, or contaminants so released;
- d. Where such releases occurred;
- e. Any and all activities undertaken in response to each such release or threatened release, including the notification of any agencies or governmental units about the releases;
- f. Any and all investigations of the circumstances, nature, extent or location of each release or threatened release including, the results of any soil, water (ground and surface) or air testing undertaken; and
- h. All persons with information relating to these releases.

**Provide copies of all documents related to these leaks, spills or releases.**

Litton does not presently have information that any leaks, spills or releases to the environment of any hazardous substances, pollutants or contaminants (including chlorinated solvents) occurred at or from the Liberty Copper and Wire facility at the Ellsworth Industrial Park Site.

- 17. Was there ever a spill, leak, release or discharge of any hazardous materials (including chlorinated solvents) into any subsurface disposal system or floor drain inside or under any building you own or operate at the Site? If the answer to the preceding question is anything but an unqualified "no," identify:**
- a. Where the disposal system or floor drains were located;
  - b. When the disposal system or floor drains were installed;
  - c. Whether the disposal system or floor drains were connected to pipes;
  - d. Where such pipes were located and emptied;
  - e. When such pipes were installed;
  - f. how and when such pipes were replaced, or repaired; and
  - g. Whether such pipes ever leaked or in any way released hazardous materials into the environment.

**Provide copies of all documents related to these leaks, spills or releases or discharges.**

Litton does not presently have information on any spill, leak, release or discharge of any hazardous materials (including chlorinated solvents) into any subsurface disposal system or floor drain inside or under the Liberty Copper and Wire facility.

- 18. Did any leaks, spills, or releases of hazardous materials (including chlorinated solvents) occur at any Facility you own or operate at the Site when such materials were being:**
- a. Delivered by a vendor;
  - b. Stored (e.g., in any tanks, drums or barrels);
  - c. Transported or transferred (e.g. to or from any tanks, drums, barrels, or recovery units); or
  - e. Treated.

**If so, provide copies of all documents related to these leaks, spills or releases.**

Please refer to the response to Question #16, above. Litton does not presently have information that any leaks, spills or releases of hazardous materials (including chlorinated solvents) occurred at the Liberty Copper and Wire facility at the Ellsworth Industrial Park Site.

19. **Has soil ever been excavated or removed from the Site? Unless the answer to the preceding question is anything besides an unequivocal "no," identify:**
- a. Amount of soil excavated;
  - b. Location of excavation;
  - c. Manner and place of disposal and/or storage of excavated soil;
  - d. Dates of soil excavation;
  - e. Identity of persons who excavated or removed the soil;
  - f. Reason for soil excavation;
  - g. Whether the excavation or removed soil contained hazardous materials and why the soil contained such materials;
  - h. All analyses or tests and result of analyses of the soil that was removed from the Site;
  - h. All persons, including contractors, with information about (a) through (h) of this request.

**If so, provide copies of all documents relating to these excavations or removals.**

Litton does not presently have information that soil has been excavated or removed from the Site.

20. **Provide records from 1950 through the present showing how much chlorinated solvent/cleaner or other chlorinated materials were purchased for any Facility or Facilities you own or operate at the Site. Provide records from 1950 through the present which show how much chlorinated solvent/cleaner or other chlorinated materials were present at the Facility or Facilities you owned or operated at the Site to be recycled or disposed. Provide the manifests showing such recycling or disposal.**

Litton does not presently have information that chlorinated solvents were purchased for or present at the Liberty Copper and Wire facility.

21. **Provide all records regarding the disposal of solid waste from the Facility or Facilities you owned or operated at the Site from 1950 through the present.**

Litton does not presently have any information regarding the disposal of solid waste from the Liberty Copper and Wire facility during the relevant period.